



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

September 28, 2022

BY ECF

The Honorable John G. Koeltl
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl St.
New York, NY 10007

APPLICATION GRANTED
SO ORDERED

John G. Koeltl, U.S.D.J.

9/28/22

Re: *United States v. Raheem Maldonado*, 15 Cr. 386 (JGK)

Dear Judge Koeltl:

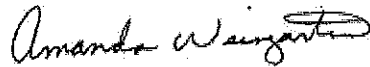
The Government submits this letter, with the consent of the defense and United States Probation Office ("Probation"), to respectfully request the unsealing of all internal chronologies and records, including, but not limited to, all texts, WhatsApp messages, notes, witness statements, videos, lab tests and reports, and TriCenter records, maintained by Probation in the Southern District of New York, detailing Raheem Maldonado's supervision from November 2021 to the present as they pertain to the violation specifications (the "Specifications") before the Court.

The Court has scheduled a VOSR hearing in this case for November 15, 2022. At that hearing, the Government intends to prove the Specifications set forth in the April 12, 2022 Violation Report, which concern conduct beginning in November 2021. The Government further anticipates that it may call a Probation Officer, among other witnesses, to testify at the hearing. Probation has indicated that they have information relevant to the Specifications and upcoming hearing contained within their chronologies and records, including relevant statements of the defendant and witnesses. Accordingly, the Government respectfully requests that the Court enter an order unsealing these chronologies and records in advance of the November 15 hearing.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By:



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cc: Avraham Chaim Moskowitz, Esq. (by ECF)
SDNY Probation Officer Michael Melaika (by email)